

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JERRY A. BRABAZON,
individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

Civil Action No. 710
Case No. 10-C-0714
Jury Trial Demanded

AURORA HEALTH CARE, INC.

Defendant.

DECLARATION OF LARRY A. JOHNSON

I, Larry A. Johnson, certify under penalty of perjury that the following is true and correct to the best of my knowledge and recollection:

1. The statements set forth in this declaration are made of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.
2. I am an adult resident of the State of Wisconsin and am an attorney in good standing, licensed to practice in Wisconsin and in front of this Court.
3. I have practiced law in Milwaukee, Wisconsin for 4 years, and have represented Plaintiffs in multiple class and collective action wage and hour matters in front of this Court.
4. My current hourly rate for class and collective action wage and hour matters is \$295 an hour.

5. I am aware that Attorneys Parsons and Zoeller have represented Plaintiffs in multiple class and collective action wage and hour matters in front the Western District of Wisconsin as well as other Federal District Courts throughout the country.

6. I am aware that Attorney Parsons' hourly rate is \$285 per hour.

7. I am aware that Attorney Zoeller's hourly rate is \$250 per hour.

8. I am aware that Attorney Murshid's hourly rate is \$200 per hour.

9. I am aware that Attorney Novotnak's hourly rate is \$325 per hour.

10. As an attorney who has practiced in this market, and as counsel on similar collective and class action wage and hour matters, I am familiar with the market rate in Milwaukee, Wisconsin for representation of plaintiffs under state law and the FLSA with respect to class and collective action wage and hour claims.

11. I understand that class counsel in the above captioned matter is filing a Motion for Preliminary Approval of Settlement, and has submitted a request for attorney's fee therewith. I further understand that the Plaintiffs participating in the settlement will receive 72% of the full value of a two year meal period claim, and payment of attorney's fees and costs and enhancement payment to the class representative.

12. Based on my experience and knowledge of the market, as well as my personal knowledge of the work of the attorneys at Hawks Quindel, S.C., my opinion is that their hourly rates are fair, reasonable, and consistent with the market rate for this type of case. Further, based on my experience and knowledge of

the market, and my review of the filings in this matter, my opinion is that the result reached for the Plaintiffs is fair and reasonable, and an excellent result relative to other wage and hour class actions that I am familiar with from around the country, including claims for repayment of meal deductions.

Executed on 7/20/11.

s/LARRY JOHNSON
Larry A. Johnson